

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CAROL BARTON,

Plaintiff,

Case No. 3:20-cv-00118

v.

Judge Campbell
Magistrate Judge Newbern

THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND
DAVIDSON COUNTY, TENNESSEE,

JURY DEMAND

Defendant.

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PLAINTIFF'S EXHIBIT LIST

Plaintiff's Exhibits

Plaintiff's Exhibits	Description	Stipulation/Objection
1.	Job Description (MNPS 2-3, Harris Ex. 4)	
2.	Support Employee Handbook (MNPS 183-223)	
3.	Time off requests (Harris Ex. 6)	
4.	List of Time off Requests (Harris Ex. 7)	
5.	Time reports	
6.	1/5/17 Email (Few Dep. Ex. 2)	
7.	Barton Statement Re: Jehovah's Witness (Barton 46)	
8.	Barton Statement to EEOC (Barton 78-79)	
9.	4/18/18 Email (Harris Dep. Ex. 5)	
10.	4/18-19/18 Email thread (Barton 84-85)	
11.	6/11/18 Email thread MNPS 4550-4551, 1402)	
12.	6/11/18 Email re Hiring Freeze (Harris Dep. Ex. 10)	

13.	6/12/18 Email (Barton 12)	
14.	6/27/18 Email re HR Meeting Agenda (Story Ex. 11)	
15.	8/14/18 Email thread from Carol Barton re: Time Away (Barton 15)	
16.	5/6/19 Notes from Few Interview (Few Dep. Ex. 3)	
17.	5/23/19 EEOC Letter (Barton 70-71)	
18.	Defendant Responses to Requests for Admission (Earnest Dep. Ex. 12)	
19.	Defendant's Responses to Interrogatories	
20.	Updated Report of Dr. Charles Baum and attachments, appendix, including Barton 128-140, Barton's 2017-2018 Time Detail Spread Sheet, Pay History, 2021 W-2	
21.	Summaries of voluminous information set forth in the Defendant's requests for admissions	
22.	EEOC charge (Barton 75)	
23.	2020 W-2	

Respectfully submitted,

HMC Civil Rights Law, PLLC

s/ Heather Moore Collins

Heather Moore Collins (# 026099)
 Ashley Shoemaker Walter (#037651)
 7000 Executive Center Dr., Suite 320
 Brentwood, TN 37027
 615-724-1996
 615-691-7019 FAX
 heather@hmccivilrights.com
 ashley@hmccivilrights.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on October 24, 2022, the forgoing was served on counsel by email through the Court's CM/ECF system to:

J. Brooks Fox
Kelli F. Woodward
Benjamin A Puckett
Metropolitan Courthouse, Suite 108
P.O. Box 196300
Nashville, Tennessee 37219-6300

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Attorney for the Defendant

/s Heather M. Collins
Heather Moore Collins